

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

LAURA A. OGLESBY,
a/k/a LAUREN ASHLEIGH HAYS,
a/k/a LAUREN ASHLEIGH SHATLEY,
[DOB: 03-11-1973],

Defendant.

No. 19-03134-01-CR-S-BP

COUNTS 1, 3, and 7

42 U.S.C. §408(a)(6)

(Intentionally Furnishing False Information to
the Social Security Administration)

NMT 5 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class D Felony

COUNT 5

42 U.S.C. §408(a)(7)(B)

(False Representation of Social Security
Number)

NMT 5 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class D Felony

COUNTS 2, 4, 6, and 8

18 U.S.C. § 1028A

(Aggravated Identity Theft)

2 Years Imprisonment

NMT \$250,000 Fine

NMT 1 Year Supervised Release

Class E Felony

Each Count: \$100 Special Assessment

INDICTMENT

THE GRAND JURY CHARGES THAT:

At all times material to this Indictment, unless otherwise set forth, with all dates and times
alleged to be “on or about” or “in or about,” and all amounts alleged to be “approximately:”

COUNT 1
42 U.S.C. § 408(a)(6)

(Intentionally Furnishing False Information to the Social Security Administration)

1. On or about January 14, 2016, in Howell County, in the Western District of Missouri, and elsewhere, the defendant, **LAURA A. OGLESBY**, knowingly, willfully, and with the intent to deceive the Commissioner of Social Security as to her true identity, made materially false statements and representations of fact for use by the Social Security Administration with respect to information required to establish and maintain records under the Social Security Act. Specifically, in applying for a Social Security Card, with intent to deceive the Social Security Administration and thereby fraudulently obtain a Social Security Card, the defendant falsely represented the Social Security Account Number, date of birth, and legal name of another person, “L.A.H.,” to have been her own Social Security Account Number, date of birth, and legal name, in violation of Title 42, United States Code, Section 408(a)(6).

COUNT 2
18 U.S.C. § 1028A
(Aggravated Identity Theft)

2. On or about January 14, 2016, in Howell County, in the Western District of Missouri, and elsewhere, the defendant, **LAURA A. OGLESBY**, knowingly used, without lawful authority, a means of identification of another person, specifically the Social Security Account Number, date of birth, and legal name of “L.A.H.,” during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit 18 U.S.C. § 408(a)(6) as charged in Count 1, knowing that the means of identification belonged to another actual person, in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT 3
42 U.S.C. § 408(a)(6)

(Intentionally Furnishing False Information to the Social Security Administration)

3. On or about February 18, 2016, in Howell County, in the Western District of Missouri, and elsewhere, the defendant, **LAURA A. OGLESBY**, knowingly, willfully, and with the intent to deceive the Commissioner of Social Security as to her true identity, made materially false statements and representations of fact for use by the Social Security Administration with respect to information required to establish and maintain records under the Social Security Act. Specifically, in applying for a Social Security Card, with intent to deceive the Social Security Administration and thereby fraudulently obtain a Social Security Card, the defendant falsely represented the Social Security Account Number, date of birth, and legal name of another person, “L.A.H.,” as her own Social Security Account Number, date of birth, and previous legal name, in violation of Title 42, United States Code, Section 408(a)(6).

COUNT 4
18 U.S.C. § 1028A
(Aggravated Identity Theft)

4. On or about February 18, 2016, in Howell County, in the Western District of Missouri, and elsewhere, the defendant, **LAURA A. OGLESBY**, knowingly used, without lawful authority, a means of identification of another person, specifically the Social Security Account Number, date of birth, and legal name of “L.A.H.” during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit 18 U.S.C. § 408(a)(6) as charged in Count 3, knowing that the means of identification belonged to another actual person, in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT 5
42 U.S.C. § 408(a)(7)(B)
(False Representation of Social Security Number)

5. On or about February 8, 2017, in Howell and Polk Counties, both in the Western District of Missouri, and elsewhere, the defendant, **LAURA A. OGLESBY**, for the purpose of obtaining for herself and any other person anything of value from any person, and for any other purpose, with intent to deceive, falsely represented a number, specifically XXX-XX-0422, to be the Social Security Account Number assigned by the Commissioner of Social Security to her in a Student Account Promissory Note submitted to “University A,” when in fact, such number was not the Social Security Account Number assigned by the Commissioner of Social Security to her, in violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNT 6
18 U.S.C. § 1028A
(Aggravated Identity Theft)

6. On or about February 8, 2017, in Howell and Polk Counties, both in the Western District of Missouri, and elsewhere, the defendant, **LAURA A. OGLESBY**, knowingly used, without lawful authority, a means of identification of another person, specifically the Social Security Account Number and name of “L.A.H.,” during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit 18 U.S.C. § 408(a)(7)(B) as charged in Count 5, knowing that the means of identification belonged to another actual person, in violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT 7
42 U.S.C. § 408(a)(6)
(Intentionally Furnishing False Information to the Social Security Administration)

7. On or about February 23, 2017, in Howell County, in the Western District of Missouri, and elsewhere, the defendant, **LAURA A. OGLESBY**, knowingly, willfully, and with

the intent to deceive the Commissioner of Social Security as to her true identity, made materially false statements and representations of fact for use by the Social Security Administration with respect to information required to establish and maintain records under the Social Security Act. Specifically, in applying for a Social Security Card, with intent to deceive the Social Security Administration and thereby fraudulently obtain a Social Security Card, the defendant falsely represented the Social Security Account Number, date of birth, and legal name of another person, "L.A.H.," to have been her own Social Security Account Number, date of birth, and legal name, in violation of Title 42, United States Code, Section 408(a)(6).

COUNT 8
18 U.S.C. § 1028A
(Aggravated Identity Theft)

8. On or about February 23, 2017, in Howell County, in the Western District of Missouri, and elsewhere, the defendant, **LAURA A. OGLESBY**, knowingly used, without lawful authority, a means of identification of another person, specifically the Social Security Account Number, date of birth, and legal name of "L.A.H.," during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit 18 U.S.C. § 408(a)(6) as charged in Count 7, knowing that the means of identification belonged to another actual person, in violation of Title 18, United States Code, Section 1028A(a)(1).

A TRUE BILL

/s/ Katherine Bakesz

FOREPERSON OF THE GRAND JURY

/s/ Steven M. Mohlhenrich

STEVEN M. MOHLHENRICH
Assistant United States Attorney

DATED: 10/01/2019